

## REMARKS

Upon entry of the present amendment, claims 1-20 and 24-32 will have been amended for consideration by the Examiner. In view of the herein contained amendments and remarks, Applicants respectfully request reconsideration and withdrawal of each of the outstanding rejections set forth in the above-mentioned Official Action, together with an indication of the allowability of all of the claims pending in the present application.

Applicants note with appreciation the Examiner's indication that claims 15, 16, 31, and 32 would be allowable if rewritten in independent form.

Applicants further note with appreciation the Examiner's consideration of the documents cited in the Information Disclosure Statements filed in the present application by the return of the initialed and signed copies of the PTO-1449 Form accompanying the Information Disclosure Statements.

The Examiner has rejected claims 1-14 and 17-30 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,456,302 to KAWAHARA et al. Applicants respectfully traverse and assert that the rejection is improper for reasons at least as set forth in the following remarks.

The present disclosed invention provides two gray scale groups. The first gray scale group, the display gray scale group, includes gray scale levels which are used for actual gray display having reduced pseudo contour. See page 11, lines 16-21 of the specification. The second gray scale group, the dithered gray scale group, includes gray scale levels each of which has a value interspersed in the

gray scale levels in the first gray scale group. See page 14, lines 15-17 of the specification. Furthermore the present disclosure sets forth that the input signal for each pixel is converted into a gray scale level in the first or second gray scale group. In order to display the gray scale level in the second gray scale group, the difference between that gray scale level and the gray scale level in the first gray scale group is diffused to adjacent pixels. See page 15, lines 16-20 of the specification and figures 2A through 2C.

The KAWAHARA et al. reference, applied by the Examiner, discloses that subfields are divided into two groups according to the weight of each subfield, and combining the two subfield groups can achieve gray-scale display for all input signals. See Column 14, lines 26-49 and figures 16 and 17.

On the contrary, the present invention uses only the gray scale levels having reduced pseudo contour noise in order to suppress the appearance of the pseudo contour noise.

Further, KAWAHARA et al. does not appear to teach a second gray scale group that includes gray scale levels interspersed in the gray scale levels of the first gray scale group. The Examiner merely refers to Figure 17 of KAWAHARA et al., which depicts a 19 bit field of information derived from dividing subfields into a first subfield group of 15 subfields, each having a luminance weight of 16, and a second subfield group of four preceding subfields, each having luminance weights of 1, 2, 4 and 8, respectively. (Fig. 17 addresses a different embodiment than to that depicted in Fig. 16 of KAWAHARA et al., in which the last 4

subfields, as opposed to the first four subfields, comprise the second subfield group.) Although Fig. 17 depicts weighted subfields, it does not appear to relate to gray scale levels in two separate gray scale groups.

The disclosed invention, in contrast, has e.g. nine subfields, which define the first and second gray scale groups (i.e., the display gray scale group and the dithered gray scale group), each having different gray scale levels. The gray scale levels of the second gray scale group are interspersed among the gray scale levels of the first gray scale group. These gray scale levels (of the second group) are not grouped on either end of the gray scale levels of the first gray scale group, as disclosed by KAWAHARA et al.

Accordingly, KAWAHARA et al. do not disclose each and every element of Applicants' claimed invention. Absent a disclosure in a single reference of each and every element recited in a claim, a *prima facie* case of anticipation cannot be made under 35 U.S.C. § 102. Since the applied references fail to disclose each and every element recited in independent claims 1 and 17 and the claims dependent therefrom, these claims are not anticipated thereby. Accordingly, the Examiner is respectfully requested to withdraw the rejection under 35 U.S.C. § 102(e).

With regard to dependent claims 2-16 and 18-32, Applicants assert that they are allowable on their own merit and at least because they depend on one of independent claims 1 and 17, which Applicants submit have been shown to be allowable.

Additionally, minor amendments have been made to claims 1-20 and 24-32 in order to make their terminology more consistent. In these amendments, Applicants have made several additional changes to the language of the claims to render the same more self consistent, as well as more fully in compliance with U.S. syntax, idiom and grammar. These amendments do not change the scope of the claims but are merely cosmetic changes that give rise to no file wrapper estoppel.

The Draftsman has also objected to the drawings as described in the PTO Form 948 dated May 30, 2003. The objection is based on the requirement that the views of the figures be consecutively numbered. The draftsman directs this objection to tables 1-10 on pages 26-35 of the specification. Applicants respectfully traverse the objection based on the fact that tables 1-10 are not drawings but are tables. The MPEP states in part in section 608.01:

#### ILLUSTRATIONS IN THE SPECIFICATION

Graphical illustrations, diagrammatic views, flow-charts, and diagrams in the descriptive portion of the specification do not come within the purview of 37 CFR 1.58(a), which permits tables, chemical and mathematical formulas in the specification in lieu of formal drawings.

Applicants therefore assert that the tables listed in the specification are allowed and are proper. Applicants further submit that the objection to the drawings is not appropriate and that the Examiner indicate such, in due course.

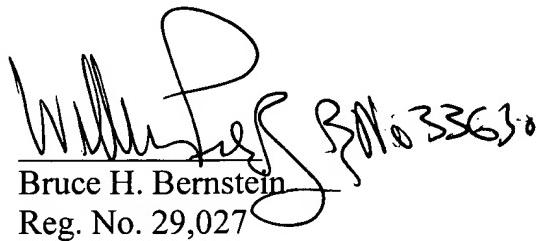
## SUMMARY AND CONCLUSION

Applicants have made a sincere effort to place the present application in condition for allowance and believe that they have now done so. Applicants have pointed out the specific language of Applicant's claims that define over the references of record and respectfully request an indication to such effect, in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Reply, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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